

Wojo,

I got your e-mail. The attached e-mail is where I told you they were about 3' x 5'. The exact dimensions of each of the four tar decanter pitch traps is 30" x 73" (15.21 sq. ft.).

In contrast, a typical Clairton tar decanter has a surface area of about 65 sq. ft.. At Clairton there are 22 operating tar decanters and only 4 tar decanter pitch traps. I'll call you to confirm that this is sufficient information.

Bill

----- Forwarded by William S Kubiak/Headquarters/USX on 05/22/2002 09:34 AM -----

William S Kubiak Wojciechowski.Edward@epamail.epa.gov	To:
	cc:
04/19/2002	Subject: Re: TAR DECANter PITCH
TRAPS	
07:42 AM	(Document link: William S Kubiak)

Wojo,

"Downstream heat transfer equipment" refers to the plate and frame heat exchangers at the primary coolers. About 60 GPM (of tar) is recycled from each bank of tar receivers (4 for each tar decanter pitch trap) to the primary coolers for naphthalene absorption. The total tar flow through each tar decanter pitch trap is 100-150 gpm, 60 gpm of which is recycled.

You were right about the effectiveness of a vertical baffle similar to those required for tar decanters. Physical configuration of the conveyor would result in control of less than 10% of the surface area. HOWEVER - keep in mind that the total surface area of each tar decanter pitch trap is only about 3' x 5'. That is much less than the uncontrolled surface area of any tar decanter. We are dealing with a very small source here.

I thought about your statement that the tar decanter pitch traps may meet the definition of a tar storage tank. There is no storage or accumulation occurring in the tar decanter pitch traps. If the outlet were shut off, the unit would overflow within seconds. They are process tanks.

Since they have been in existence since long before the NESHAP rules, they must have been considered for regulation by EPA but, since they are unique to Clairton and Subpart L requires controls on equipment which is generally in use at all byproduct plants, EPA simply is relying on the "in benzene service" control requirement. Since they are not "in benzene service" (and they are very small), they are simply not a significant source of benzene and were never intended to be controlled under Subparts L or V. Only named equipment and other equipment "in benzene service" are required to be controlled..

Call me with any questions. I had a long talk with the people at Clairton

that operate this equipment and I have a much better understanding of the process now and I'm even more convinced than before that controls are not required. You and Jim are welcome to come to Clairton to take a look at the equipment.

Bill

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il.epa.gov

To: wskubiak@uss.com

cc:

04/17/2002 03:15 PM

Subject: TAR DECANter

PITCH TRAPS

Bill - Just a nudge, so I can get back to Hagedorn. Did you get the opportunity to talk to your people at Clairton works? wojo